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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

DISABILITY RIGHTS OREGON;
METROPOLITAN PUBLIC DEFENDERS
INCORPORATED; and A.J. MADISON,

Plaintiffs,

v.

PATRICK ALLEN, in his official capacity as
Director of Oregon Health Authority; and
DOLORES MATTEUCCI, in her official
capacity as Superintendent of the Oregon State
Hospital,

Defendants,

and

LEGACY EMANUEL HOSPITAL &
HEALTH CENTER d/b/a UNITY CENTER
FOR BEHAVIORAL HEALTH; LEGACY

Case No.: 3:02-cv-00339-MO (Lead Case)

**DECLARATION OF ALEX VAN
RYSSELBERGHE IN SUPPORT OF
PLAINTIFFS LEGACY EMANUEL
HOSPITAL & HEALTH CENTER D/B/A
UNITY CENTER FOR BEHAVIORAL
HEALTH, LEGACY HEALTH SYSTEM,
PEACEHEALTH, PROVIDENCE
HEALTH & SERVICES – OREGON, AND
ST. CHARLES HEALTH SYSTEM'S
MOTION FOR RECONSIDERATION OF
THE MAY 25, 2023 OPINION AND
ORDER AND TO VACATE THE MAY 30,
2023 JUDGMENT**

ORAL ARGUMENT REQUESTED

HEALTH SYSTEM; PEACEHEALTH; and
PROVIDENCE HEALTH & SERVICES –
OREGON,

Intervenors.

JAROD BOWMAN; and JOSHAWN
DOUGLAS SIMPSON,

Plaintiffs,

v.

DOLORES MATTEUCCI, Superintendent of
the Oregon State Hospital, in her individual and
official capacity; PATRICK ALLEN, Director
of the Oregon Health Authority, in his
individual and official capacity,

Defendants,

and

LEGACY EMANUEL HOSPITAL &
HEALTH CENTER d/b/a UNITY CENTER
FOR BEHAVIORAL HEALTH; LEGACY
HEALTH SYSTEM; PEACEHEALTH; and
PROVIDENCE HEALTH & SERVICES –
OREGON,

Intervenors.

Case No.: 3:21-cv-01637-MO (Member Case)

LEGACY EMANUEL HOSPITAL &
HEALTH CENTER d/b/a UNITY CENTER
FOR BEHAVIORAL HEALTH; LEGACY
HEALTH SYSTEM; PEACEHEALTH;
PROVIDENCE HEALTH & SERVICES –
OREGON; and ST. CHARLES HEALTH
SYSTEM,

Plaintiffs,

v.

PATRICK ALLEN, in his official capacity as
Director of Oregon Health Authority,

Defendant.

Case No.: 6:22-cv-01460-MO (Member Case)

I, Alex Van Rysselberghe, declare as follows:

1. I am an associate attorney at Stoel Rives LLP, and I am one of the attorneys representing Plaintiffs Legacy Emanuel Hospital & Health Center d/b/a Unity Center for Behavioral Health, Legacy Health System, PeaceHealth, Providence Health & Services – Oregon, and St. Charles Health System (“Plaintiffs”) in this action. I am competent to testify about the matters set forth herein and make this declaration based on my personal knowledge. I submit this declaration in support of Plaintiff’s Motion for Reconsideration of the May 25, 2023 Opinion and Order and to Vacate the May 30, 2023 Judgment.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Second Amended Complaint.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Second Amended Complaint, with redlines.

I hereby declare that the above statement is true and correct to the best of my knowledge and belief and that I understand it is made for use as evidence in court and subject to penalty for perjury.

DATED: June 26, 2023

Respectfully submitted,

STOEL RIVES LLP

/s/ Alex Van Rysselberghe

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